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February 23, 2009  
Via ECFS Transmission

Ms. Marlene H. Dortch, FCC Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

**RE: Operator Service Company, LLC - 2008 CPNI Certification Filing  
EB Docket No. 06-36**

Dear Ms. Dortch:

Pursuant to the Commission's Public Notice of January 07, 2009, enclosed for filing please find the 2008 Annual CPNI Compliance Certification submitted on behalf of Operator Service Company, LLC, as required by section 64.2009(e) of the Commission's rules.

Any questions you may have concerning this filing may be directed to me at 407-740-3004 or via email to [rnorton@tminc.com](mailto:rnorton@tminc.com).

Sincerely,

Robin Norton  
Consultant to Operator Service Company, LLC

RN/lm

cc: Best Copy and Printing, Inc. - [FCC@BCPIWEB.COM](mailto:FCC@BCPIWEB.COM)  
cc: FCC Enforcement Bureau (2 copies)  
cc: Jennifer Hinojosa - OSC  
file: OSC - FCC  
tms: FCCx0901

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for Calendar Year:   **2008**

Name of company covered by this certification:               **Operator Service Company, LLC**


Form 499 Filer ID:   **811236**

Name of signatory:   **Scott DeNardo**

Title of signatory:   **Vice President of General Counsel**

I, **Scott DeNardo**, certify and state that:

1.    I am the **Vice President of General Counsel** of **Operator Service Company, LLC** and, acting as an agent of the company, I have personal knowledge of **Operator Service Company, LLC's** operating procedures as they relate to CPNI, and the Rules and Regulations of the Federal Communications Commission regarding CPNI.
2.    I hereby certify that, to the best of my knowledge, information and belief, **Operator Service Company, LLC's** operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Commission's rules found at 47 CFR Subpart U.
3.    Attached to this certification as Exhibit A is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

  
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**Scott DeNardo, Vice President of General Counsel**  
Kgb USA, Inc. (Managing Member)

\_\_\_\_\_  
**February 20, 2009**  
Date

**Exhibit A**  
**Statement of CPNI Procedures and Compliance**

**Statement of CPNI Procedures and Compliance**  
**For 2008**  
**Operator Service Company, LLC**

Operator Service Company, LLC operates solely as an operator service provider and as such provides only operator assisted call completion services for its client end users. Therefore, all of our services consist of traffic provided on behalf of our clients and outside of any subscribed service relationship with OSC. We do not obtain or retain any CPNI that could be used for marketing purposes.

We do not actively market the operator services product. We offer operator services as a bundled package with our directory assistance services. Discussions of the operator service product are directed only towards payphone owners, hospitality locations, and Independent Local Exchange carriers (ILEC's), and such efforts do not include the use of CPNI. Should we expand our business in the future to include the provision of services that involve CPNI, we will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed, that it implements authentication procedures that do not require the use of readily available biographical information or account information, that it notifies customers of account changes, and informs law enforcement in the event of a breach of customer CPNI.

We do not provide call detail information over the telephone. All customer service personnel are trained not to discuss call detail information with end users unless the calling party can identify the call detail related to their inquiry. Customers (inbound callers into our Customer Service Center) are required to give the call detail information to the Customer Service Representatives (from the bill they received) as well as their names prior to providing any assistance or information. We only disclose the information requested that comes directly from the billed information. The customer must have the call detail from the bill when calling and must be the person whose name is on the account.

We do not disclose call detail on-line to end users under any circumstances. We do not have a subscriber relationship with our customers, and do not have customer accounts. We do provide on-line access to our clients (payphone owners, hospitality locations and ILEC's) via a secured FTP site. Each client receives a unique login and password in order to be able to view their customers' call detail on that site. This ensures that this information is safeguarded from other clients, customers or employees. In addition, clients calling with inquiries about their on-line data must provide the correct password to OSC personnel. Only authorized OSC personnel have access to the client passwords or to our database. We do not have a back-up authentication method in the event a password is forgotten. In that case, the primary person associated with our client account must request a new password via authorized procedures; we will then provide the new password to that individual only.

As an operator services provider, we do not have any retail locations and therefore do not disclose CPNI in-store.

We have procedures in place to notify law enforcement in the event of a breach of the call detail records. We have not had any such breaches during 2008, but we have a process in place to maintain records of any breaches discovered and notifications made to the USSS and the FBI.

We have not taken any actions against data brokers in the last year.

We did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2008.

Due to the nature of the operator services business, the call detail we have is not tied to any presubscribed customers. Accordingly, we have not developed any information with respect to the processes pretexters may use to attempt to access CPNI.